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Passages Silver Strand LLC and  
Grasshopper House LLC

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**Grasshopper House LLC**, a California limited liability company doing business as Passages Malibu, **Passages Silver Strand LLC**, a California limited liability company,

Plaintiffs,

vs.

**Renaissance Malibu Foundation**, a California non-profit corporation.

Defendant

**Salvatore Petrucci**, an individual; **Renaissance Recovery Services, LLC**, a California limited liability company; **NNB Recovery Services, LLC**, a California limited liability company.

Additional Parties Bound By Injunction

Civil Case No.: 3:09-CV-778-HA

**MOTION FOR ORDER TO SHOW  
CAUSE WHY SALVATORE  
PETRUCCI, RENAISSANCE  
RECOVERY SERVICES, LLC, NNB  
RECOVERY SERVICES LLC, AND  
RENAISSANCE MALIBU  
FOUNDATION SHOULD NOT BE  
HELD IN CONTEMPT OF  
INJUNCTION**

**Request for Oral Argument**

**Expedited Evidentiary Hearing  
Requested**

Pursuant to L.R. 7.1, the undersigned counsel certifies that we have conferred with counsel for Renaissance Recovery Services, LLC, NNB Recovery Services LLC, and Salvatore Petrucci, and the parties have been unable to resolve the dispute after a good faith effort.

Pursuant to Fed.R.Civ.P. 65(d), 70, and 71, Plaintiffs request an order to show cause why Salvatore Petrucci, Renaissance Recovery Services LLC, NNB Recovery Services LLC, and Renaissance Malibu Foundation should not be held in civil contempt for violating this Court's permanent injunction. CEO Petrucci and closely intertwined entities under his common control are within the scope of the injunction ordered against Defendant Renaissance Malibu Foundation and its "officers, directors, employees, agents, servants, and all persons, firms, corporations, franchisees and associates in concert or participation with Defendants" against using Plaintiffs trademarks in internet advertising. Petrucci, Renaissance Recovery Services LLC, and NNB Recovery Services LLC are non-party legal affiliates of Defendant with actual notice of the injunction who are willfully violating the injunction.

This motion is based upon the accompanying Memorandum, the Declaration of David Kaiser dated May 25, 2010 the Declaration of Melissa Smith, dated May 25, 2010 the exhibits attached thereto, and the pleadings and papers on file in this action.

Respectfully submitted:

Dated: May 25, 2010

/s/ Lainie Block

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